



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 4, 2024

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW)**

Dear Judge Woods:

The Government respectfully writes to request that the Court enter the enclosed proposed protective order, upon consent of counsel for defendants Vadim Wolfson and Gannon Bond, governing the disclosure of discovery materials in the above-referenced matter. The Government submits that entry of the proposed order is appropriate in this case for the reasons stated in the proposed order. Among other things, by substantially reducing the need for redactions of personal and financial information, the proposed order will help to expedite the production of discovery by the Government and the review of the documents by the defendants and their counsel.

With regard to the status of discovery, the Government provided an initial production to both defendants on Wednesday, March 27, 2024. We anticipate making a second production by the end of this week and will be continuing to make additional rolling productions.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Emily Deininger / David Felton
Assistant United States Attorneys
(212) 637-2472 / 2299

cc: Counsel of Record (by ECF)